IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SUN CHENYAN)
Plaintiff,)
*) Case No. 20-cv-0220
V.)
THE PARTNERSHIPS AND) Judge John F. Kness
UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A",) Mag. Judge M. David Weisman
IDENTIFIED ON SCHEDULE A,)
Defendant.)
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PLAINTIFF SUN CHENYAN'S SECOND UNOPPOSED MOTION TO APPEAR TELEPHONICALLY AT THE APRIL 22, 2025 STATUS CONFERENCE, OR IN THE ALTERNATIVE, MOTION TO CONTINUE THE APRIL 22, 2025 IN-PERSON STATUS CONFERENCE

Plaintiff Sun Chenyan ("Plaintiff"), by and through her counsel, Ford Banister IP, hereby moves this Honorable Court to grant leave for Plaintiff counsel to appear telephonically at the April 22, 2025 status conference. In the alternative, Plaintiff requests for this Honorable Court to continue the April 22, 2025 in-person status conference. In support of her request, Plaintiff states as follows:

- 1. On February 10, 2025, this Court entered a Minute Order setting this case for an in-person status conference on February 26, 2025. (D.E. 304).
- 2. On February 20, 2025, Plaintiff moved for an unopposed extension of time based upon the unexpected February 14, 2025 departure of Plaintiff's counsel with Ford Banister IP assigned with this case. (D.E. 306). This Court granted the extension and reset the hearing for March 20, 2025. (D.E. 307).

- 3. On March 19, 2025, at the Court's instance, the status hearing for March 20, 2025 was reset to April 22, 2025. (D.E. 310).
- 4. Despite the undersigned's efforts, the vacant position based in Chicago has not yet been filled. The undersigned, located in Florida, is unable to appear in-person for the April 22, 2025 status conference. However, the undersigned is available to appear by telephone for the April 22, 2025 status conference.
- 5. In the alternative, counsel for Plaintiff requests for an extension of time for an in-person appearance. Plaintiff respectfully submits that even if the vacant position is not fulfilled, the undersigned would be available for an in-person appearance preferably on or after June 10, 2025. Of course, the undersigned recognizes that this Court may require a sooner date, even if it is inclined to grant an extension.
- 6. The undersigned has conferred with Michael Adams, counsel for Defendants, who advised that Defendants are not opposed to having the hearing (1) by phone or (2) in-person once Plaintiff has retained local counsel. Specifically, Defendants do not oppose an extension until the proposed time frame of June 10, 2025 or shortly thereafter.
- 7. The instant request for extension of time is not presented for purposes of harassment or delay.
 - 8. No party will be prejudiced by the grant of the instant request.

Prayer for Relief

Wherefore, Plaintiff requests that the Court grant the following relief:

- That the Court permit Plaintiff counsel to appear telephonically for the April 22,
 status conference; or in the alternative,
 - 2) That the Court continue the in person status conference until after June 10, 2025.

3) Any further and additional relief that the Court deems necessary and appropriate. Respectfully submitted this 8th of April, 2025,

/s/ Lydia Pittaway Bar No. 44790 Ford Banister IP 305 Broadway - Floor 7 New York, NY 10007 Telephone: 212-500-3268

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Attorney for Plaintiff